REMARKS

Claims 1-12 are all the claims pending in the application. By this Amendment, Applicant amends claims 1 and 10-12. No new matter is added. Support for the amendments is found, *e.g.,* at pages 3 and 7 of the specification as filed. Reconsideration and allowance of claims 1-12 are respectfully requested in view of the following remarks.

I.   Preliminary Matters

Applicant thanks the Examiner for accepting the drawings filed on December 23, 2003. Applicant also thanks the Examiner for acknowledging the claim to foreign priority and for confirming that the certified copy of the priority document was received.

Finally, Applicant notes with appreciation that claims 7 and 9 are considered patentable over the prior art of record.

II.   Prior Art Rejections

Claims 1 and 10-12 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,597,370 to Lee (hereinafter "Lee") in view of U.S. Patent No. 6,404,422 to Choi (hereinafter "Choi"). Claims 2-6 and 8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lee and Choi and further in view of U.S. Patent No. 5,990,968 to Naka et al. (hereinafter "Naka"). Applicant respectfully traverses this rejection because the references fail to teach or suggest all of the elements as set forth and arranged in the claims.

Specifically, Lee in view of Choi does not disclose or suggest "applying the predefined analog video signal to the image-reproducing device; comparing the digital image data buffered in the image memory with predefined data that corresponds to the predefined analog video signal," as recited in claims 1 and 10. Nor do the references disclose or suggest "an image

generator configured to generate the <u>predefined analog video signal</u>, which is applied to the image-reproducing device and converted into the digital image data; and a memory configured to store predefined data for comparison with the digital image data, wherein the predefined data stored in the memory <u>corresponds</u> to the predefined analog video signal," as recited in claims 11 and 12.

The Examiner contends that Lee teaches the above-noted unique features of claims 1 and 10-12, citing col. 4, lines 7-67 and FIG. 2. More specifically, the Examiner alleges that the input R,G,B analog signal in FIG. 2 corresponds to the predefined analog video signal, recited in claims 1 and 10-12. *See* page 2 of the Office Action. Applicant respectfully disagrees with the Examiner's interpretation of the Lee reference.

Lee relates to "an apparatus and a method for compensating a distorted clock phase" of a monitor. *See* col. 1, lines 9-11.

In particular, Lee teaches

> [t]he A/D converter 40 . . . samples the analog R/G/B image signals transmitted from the main body according to the clock pulse, and thus converts the R/G/B/image signals to digital image signals, and outputs the digital signals to the scaler 50. The digital image signals output from the scaler 50 are then fed back to the microcomputer 10, and the microcomputer 10 extracts a predetermined area from the input digital image signals to detect a corresponding number of clock pulses. The detected number of clock pulses is compared with the reference data that is stored in the first memory 20, so as to detect generation of an abnormal clock phase.

See col. 4, lines 45-56. In other words, Lee teaches an analog RGB-video signal, which is digitized with an analog/digital converter. A scaler extracts clock data from the gained digital image signal and a microcomputer extracts a predetermined area from the input digital signal to detect a number of clock pulses that are compared with reference data stored in a memory.

However, Lee does <u>not</u> teach a predefined analog video signal that is applied to an image reproducing device and digital image data buffered in the image memory that is compared with predefined data that <u>corresponds</u> to the predefined analog video signal, as recited in claims 1 and 10 and as analogously recited in claims 11 and 12.

By contrast, the RGB video signal is not further specified in Lee. As discussed above, in Lee clock data is compared to reference data. That is, the adjustment in Lee is made independent from the content of the analog video signal. Accordingly, the analog video signal in Lee is not a predefined analog video signal as recited, *inter alia,* in claims 1 and 10-12. Furthermore, there is no predefined data in Lee that corresponds to a predefined analog video signal.

As a result, Lee does not disclose or suggest all of the elements as set forth and arranged in independent claims 1 and 10-12. Choi is cited by the Examiner only for its alleged disclosure of adjusting the scanning frequency (*see* page 3 of the Office Action) and as such does not cure the deficient disclosure of Lee. Therefore, Applicant respectfully requests that the rejection of claims 1 and 10-12 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

Claims 2-6 and 8 depend from claim 1. Naka does not remedy the deficiencies of Lee and Choi. Thus, claims 2-6 and 8 are patentable over Lee, Choi and Naka at least by virtue of their respective dependencies.

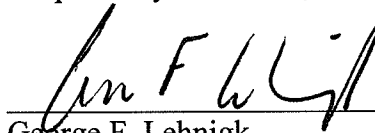### III.   Allowable Subject Matter

Claims 7 and 9 are objected to as being dependent upon a rejected base claim. Since claims 7 and 9 depend from claim 1, these claims are patentable not only for reasons identified by the Examiner but also by virtue of their dependencies.

IV.   Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

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Respectfully submitted,

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